

U.S. Department of Justice

SSM:RTH:EMR:KL
DJ 175-48-298

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February 19, 2021

By ECF

The Honorable Mark Falk
Chief Magistrate Judge
District of New Jersey
U.S. Post Office & Courthouse
Federal Square
Newark, NJ 07102

Re: **United States v. Centanni, No. 2:20-cv-10053 (JMV) (MF)**

Dear Chief Judge Falk:

We write on behalf of both parties to update the Court in advance of the February 25, 2021 status conference scheduled in the above-referenced matter. *See* ECF No. 14. With respect to discovery, the parties have served their Rule 26(a) disclosures and initial written discovery requests. The parties will begin to produce documents on February 26, 2021.

Over the past several weeks, the parties have begun to explore potential resolution of this matter before the defendant devotes substantial resources to discovery. In light of the progress made during those discussions, the parties respectfully request a 60-day extension of all dates currently set forth in the scheduling order entered on November 30, 2020. *See* ECF No. 12. The parties will be prepared to discuss the status of a potential resolution, as well as the exchange of written discovery that may aid those efforts, during the February 25 conference.

We thank the Court for its attention to this matter.

Respectfully submitted,

SAMEENA SHINA MAJEED
Chief, Housing and Civil Enforcement
Section

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Acting United States Attorney

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Erin Meehan Richmond
Trial Attorney

By: s/ Susan Millenky
Susan Millenky
Assistant United States Attorney

cc: Counsel of Record (By ECF)

CERTIFICATE OF SERVICE

I, Susan Millenky, Assistant United States Attorney for the District of New Jersey, hereby certify that on February 19, 2021, a copy of the foregoing letter was served on counsel for all parties by ECF.

Dated: Newark, New Jersey
February 19, 2021

s/ Susan Millenky
SUSAN MILLENKY
Assistant United States Attorney